

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

UNITED STATES OF AMERICA

v.

BRADLEY BRITTON

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**CRIMINAL NO. 4:19-CR-00591**

**DEFENDANT'S MOTION TO MODIFY CONDITIONS OF RELEASE**

TO THE HONORABLE JUDGE DAVID HITTNER:

COMES NOW Bradley Britton, Defendant, by and through his counsel, Trevor Sharon, requests this Court to enter an order modifying the conditions of release, to permit Mr. Britton to travel to the Lake Charles, Louisiana for work purposes and in support thereof will show as follow:

**Statement of Facts**

1. Defendant works as a roofer and has been working within the restricted area during his pretrial release.
2. Defendant has an ankle monitor and has been compliant with pretrial supervision.
3. Recently, Hurricane Laura devastated parts of Louisiana and Texas. Defendant's company is seeking to obtain work in this devastated area and have requested the Defendant to work there.
4. Defendant seeks permission to work in Louisiana near Lake Charles for the months of September and October. Defendant has arranged for a possible house where he

can stay near Lake Charles. He is also willing to return to his home every day if the court desires.

5. I have conferred with the Government and they defer the decision to the Court.

WHEREFORE, PREMISES CONSIDERED, Bradley Britton prays that the Court enter an Order modifying the Conditions of Release by permitting him to work and travel to the Lake Charles, Louisiana area (Calcasieu Parish and the surrounding parishes).

Respectfully submitted,

**PAUL DOYLE & ASSOCIATES, P.C.**

By: /s/ Trevor Sharon

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**CERTIFICATE OF SERVICE**

I hereby certify that on September 1, 2020, the foregoing document was electronically transmitted to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to counsel of record.

/s/ Trevor Sharon

Trevor Sharon